

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

MALEEHA AHMAD, et al.,

Plaintiffs,

v.

CITY OF ST. LOUIS,

Defendant.

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Case No. 4:17-CV-2455 CDP

**AGREED MOTION AND PROTECTIVE ORDER--ATTORNEY/EXPERT
"EYES ONLY"**

Defendant City of St. Louis moves the Court to enter the following protective order pertaining to a document identified as City Bates 416-493. F.R.Civ.P. 26(c)(1). Plaintiffs' counsel agrees to the order. The document consists of a detailed operations order issued by the acting chief of police in September 2017 and contains specific information concerning police staging areas and command posts which could be utilized in the future. Unlimited disclosure of the document could jeopardize police operations in the future and subject police officers to danger. Accordingly, defendant requests that the following be entered:

ORDERED that the document identified as City Bates 416-493 shall be produced to plaintiffs' counsel forthwith in redacted form, omitting addresses of staging areas and command posts and the names of individual officers (other than previously identified command rank officers or sergeants) and their specific identifying information (DSN, call numbers); and it is

FURTHER ORDERED that the document identified as City Bates 416-493 will not be disclosed by plaintiffs' counsel except to the expert witness Golden, without leave

of Court or agreement of defendant, and witness Golden shall be required to execute a consent to be bound by the terms of this Order, and all copies of said document shall be returned to counsel for the City at the conclusion of this action, together with a declaration that all electronic copies have been deleted.

JULIAN L. BUSH
CITY COUNSELOR

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CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2019, the foregoing was served on counsel of record for plaintiffs by e-mail.

/s/ Robert H. Dierker 23671MO